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November 13, 2017

BY ECF

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Beckish, et al., 17 CR 569 (ER)

Dear Judge Ramos:

I am writing on behalf of defendant Joseph Anthony Demaria to respectfully request a modification of the defendant's bail conditions which would permit him to travel to Orlando, Florida from December 14, 2017 through December 18, 2017 in order to take his twin daughters to Disney World for their birthdays. Mr. Demaria's probation officer, Marisa Barwig, has no objection to this request, and the government, by AUSA Danielle Sassoon, defers to Probation's position on this application. Mr. Demaria's sureties have consented to this request.

By way of background, on July 20, 2017, Mr. Demaria was released by Judge Sarah Netburn on a \$500,000 personal recognizance bond secured by property and signed by two financially responsible persons, with travel limited to the Southern and Eastern Districts of New York, the Southern District of Florida, and the District of New Jersey. In the time since his release, Mr. Demaria has remained compliant with his bail conditions.

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Thank you for your consideration on this application. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Danielle Sassoon, Esq. (by email & ECF)
Assistant United States Attorney

So Ordered:

Hon. Edgardo Ramos, U.S.D.J.